

Hon. Thomas S. Zilly

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RYAN DIAZ, JARED THOMPSON, ARIEL
ENRIQUEZ, PAUL BARR, JOHN RIOS,
DAVID GUY, LISANDRO LIZARDO, CHRIS
LUEBCKE, ROBERT FOUCHA, NICHOLAS
YOCHHEIM, ALEX COLLINS, ZACKERY
REED, GRANT HOELSCHER, MICHAEL
OREN, NATHAN AIMS WORTH, JAMES
COFFEY-WOLFGANG, ERIC WILSON,
LYDIA DELOACH.

Plaintiffs,

v.

NINTENDO OF AMERICA, INC.,

Defendant.

NO. 2:19-cv-01116-TSZ

**CLRA VENUE DECLARATION
OF PLAINTIFF RYAN DIAZ
PURSUANT TO CALIFORNIA
CIVIL CODE SECTION 1780(d)**

I, Ryan Diaz, declare as follows:

1. I have personal knowledge of the facts stated herein and, if called upon to do so, could competently testify thereto.

2. I am a Plaintiff in the above-captioned action.

3. I submit this declaration in support of the First Amended Class Action Complaint, which is based in part on violations of the Consumers Legal Remedies Act, California Civil Code §§ 1750 *et seq.*

4. The First Amended Class Action Complaint has been filed in the proper place for trial of this action.

CLRA VENUE DECLARATION
OF PLAINTIFF RYAN DIAZ PURSUANT TO
CALIFORNIA CIVIL CODE SECTION 1780(d)

TOUSLEY BRAIN STEPHENS PLLC
1700 Seventh Avenue, Suite 2200
Seattle, Washington 98101
TEL. 206.682.5600 • FAX 206.682.2992

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2 5. Defendant Nintendo of America, Inc. has its principal place of business in
3 Redmond, Washington, which is within King County. Nintendo conducts substantial business,
4 including the acts and practices at issue in this action, within King County.

5 I declare under penalty of perjury under the laws of the United States that the foregoing
6 is true and correct to the best of my knowledge.

7 Executed on Oct. 2, 2019 in Vallejo, California.

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Ryan Diaz

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CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

DATED at Seattle, Washington, this 4th day of October, 2019.

s/Kim D. Stephens
Kim D. Stephens